CLEAR SPRINGS FOODS®

JOHN R. MACMILLAN
VICE PRESIDENT

CLEAR SPRINGS FOODS, INC.
P.O.Box 712, Buhl, Idaho 83316
Phone 208 543-3462
Fax 208 543-4146

April 10, 2014

Mr. Chris Gebhardt, Compliance Unit
US Environmental Protection Agency, Region 10
1200 Sixth Ave., Suite 900
Seattle, WA 98101

Re: Clear Springs Food, Inc. Processing Total Residual Chlorine Reporting

Dear Mr. Gebhardt:

On April 7, 2014, you contacted Clear Springs Foods, Inc. (Mr. Andy Morton) regarding the units of measure we used when reporting Total Residual Chlorine (TRC) on our Processing Plant (NPDES Permit number IDG132002) Discharge Monitoring Reports (DMR).

The current NPDES permit "Fish Processors associated with Aquaculture Facilities in Idaho" has a variety of units of measurement associated with TRC. The TRC effluent numeric limitations are identified as 0.011 mg/L average monthly and 0.019 mg/L maximum daily (Table 2). The monitoring requirement is in µg/L (Table 3) with footnote #6 requiring "non-detects" to be reported no higher than "0.1 mg/L." The Method Detection Limit (MDL) for TRC is 0.1 mg/L (Table 5) and Appendix D.3.b under DMR Reporting states that for influent or effluent values less than the MDL, the permittee must report a concentration as less than the actual MDL on the DMR. Since the MDL for TRC is 0.1 mg/L, we have been reporting values less than the MDL as < 0.1 mg/L since permit inception (Dec. 1, 2007).

You have requested Clear Springs Foods change our DMR TRC concentrations from mg/L to µg/L. Effective retroactively and henceforth all reported TRC concentrations will be reported as µg/L. Since 1 mg is the same as 1000 µg, the TRC MDL of 0.1 mg/L is equivalent to 100 µg/L. Clear Springs Foods will henceforth report (effective with the March 2014 DMR submittal) TRC values less than the MDL as <100 µg/L. Our previous DMR TRC concentrations in which we report <0.1 mg/L should be regarded as <100 µg/L.

We appreciate the TRC DMR report unit clarification. This letter should serve as a correction notice for DMR reports submitted for permit number IDG132002 with a permit effective date of December 1, 2007.

Sincerely,

John R. MacMillan, Ph.D.
Vice President

cc: Diane Davis

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